Buchanan Ingersoll & Rooney PC Attorneys & Government Relations Professionals

William E. Manning 302 552 4210 william.manning@bipc.com The Brandywine Building 1000 West Street, Suite 1410 Wilmington, DE 19801-1054 T 302 552 4200 F 302 552 4295 www.buchananingersoll.com

June 12, 2007

VIA CM/ECF

Ms. Deborah Krett
Case Manager
United States District Court
844 North King Street, Lock Box 27
Wilmington, DE 19801

Re: LG.Philips LCD Co. Ltd. v. Chi Mei Optoelectronics Corp., et al.

Case No. 06-726-JJF

Dear Ms. Krett:

We represent Defendants Tatung Company and Tatung Company of America (the "Tatung Defendants") and, with this letter, I ask that you reconsider the June 11 decision to strike our June 5 Motion For a More Definite Statement (the "Motion") (D. I. 70). We understand that the Motion was stricken for two reasons: 1) failure to comply with the 30-day requirement set forth in His Honor's Standing Order; and 2) failure to e-mail a copy of the Notice of Motion to Chambers. We apologize for that latter oversight and have included a copy of the Notice with this letter.

With respect to the timing of our Motion, we do not understand how we might have complied with the 30-day requirement in the Standing Order while simultaneously meeting our June 5 deadline for the Motion. While such a motion is expressly permitted under Fed. R. Civ. P. 12(e), it was required to be filed on or before June 5 – the date the answer was otherwise due. Thus, although the Motion is non-dispositive, we were unable comply with the Court's Standing Order and wait until a date that was within the 30 days of the next motion day.

Accordingly, we request that our motion be reinstated and seek your guidance on how to deal with this type of issue in the future. While a party in our position may have no relief from the deadline for the answer, we would be happy to postpone the filing of the Notice of Motion until the 30-day period prior to the next motion day or follow whatever other guidance you might have. However, while we doubt that the Plaintiff will move for the entry of a default judgment, it is important that the record reflect that our Motion was timely filed.

June 12, 2007

Page - 2 -

I look forward to hearing from you.

Respectfully,

William E. Manning (#697)

Enclosure WEM/psr

cc: Counsel of Record

Clerk of Court

726-JJF Document 70-2 Filed 06/05/2007 Page 1 of 2

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

LG.PHILIPS LCD CO., LTD,

Plaintiff,

Civil Action No. 06-726-JJF

DEMAND FOR JURY TRIAL

V.

CHI MEI OPTOELECTRONICS CORPORATION; AU OPTRONICS CORPORATION; AU OPTRONICS CORPORATION AMERICA; TATUNG COMPANY; TATUNG COMPANY OF AMERICA, INC.; AND VIEWSONIC CORPORATION,

Defendants.

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendants Tatung Company and Tatung Company of America's Motion for a More Definite Statement will be presented to the Court on July 13, 2007 at 10:00 a.m.

Dated: June 5, 2007

BUCHANAN INGERSOLL & ROONEY

William E. Manning, Esq. (#697)
Jennifer M. Becnel-Guzzo, Esq. (#4492)
1000 West Street, Suite 1410
Wilmington, DE 19801
(302) 552-4200
(302) 552-4295 (facsimile)
william.manning@bipc.com
jennifer.becnelguzzo@bipc.com

Of Counsel:

BUCHANAN INGERSOLL & ROONEY LLP Bryan J. Sinclair, Esq. (pro hac vice) Karineh Khachatourian, Esq. (pro hac vice) Jeffrey M. Ratinoff, Esq. (pro hac vice) 333 Twin Dolphin Drive, Suite 700 Redwood Shores, CA 94065-1418 Telephone: (650) 622-2300 Facsimile: (650) 622-2499 Email: bryan.sinclair@bipc.com

Email: karineh.khachatourian@bipc.com

Email: jeffrey.ratinoff@bipc.com

-And-

USASIA LAW, APC Joseph S. Wu, Esq. (pro hac vice) 5670 La Jolla Blvd La Jolla, CA 92037 Telephone: (858) 454-8588 Facsimile: (858) 454-4314 Email: jwulawyer@gmail.com

-And-

X-PATENTS, APC
Jonathan Hangartner, Esq. (pro hac vice)
5670 La Jolla Blvd
La Jolla, CA 92037
Telephone: (858) 454-4313
Facsimile: (858) 454-4314
Email: jon@x-patents.com

Attorneys for Defendants Tatung Company and Tatung Company of America